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## Attorneys for Debtor and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA**

## **LOS ANGELES DIVISION**

In re: \_\_\_\_\_ | Case No.: 2:21-bk-18205-DS

CRESTLLOYD, LLC, Chapter 11 Case

## **Debtor and Debtor in Possession.**

**DEBTOR'S NOTICE OF MONTHLY FEE  
STATEMENT OF SIERRA CONSTELLATION  
PARTNERS, LLC**

[April 1, 2022 through April 30, 2022]

[No Hearing Required, Unless Timely Opposition and Request for a Hearing is Filed]

1           **PLEASE TAKE NOTICE** that, (A) on October 28, 2021, Crestlloyd, LLC, the Chapter  
2 11 debtor and debtor in possession herein (the “Debtor”), filed a *Notice of Setting/Increasing Insider*  
3 *Compensation* (the “Notice of Insider Compensation”) for SierraConstellation Partners LLC/Lawrence  
4 R. Perkins (“SCP”) and served it on the UST and other parties, (B) on November 16, 2021, the United  
5 States Trustee (the “UST”) filed its *Objection To Notice Of Insider Compensation* (the “Objection”)  
6 [Dkt. 35] objecting to SCP’s Notice of Insider Compensation, (C) on December 13, 2021, the Debtor  
7 filed its *Stipulation [With the UST] (1) Resolving UST Objection To Notice Of Insider Compensation*  
8 *And (2) Vacating Hearing Thereon* (the “Insider Compensation Stipulation”) [Dkt. 72], (D) on  
9 December 16, 2021, the Court entered its *Order Approving Stipulation [With the UST] (1) Resolving*  
10 *UST Objection To Notice Of Insider Compensation And (2) Vacating Hearing Thereon* (the “Insider  
11 Compensation Order”) [Dkt. 77].

12           **PLEASE FURTHER TAKE NOTICE THAT**, pursuant to the Insider Compensation  
13 Stipulation and Insider Compensation Order, “SCP must file monthly fee statements [each a “Fee  
14 Statement”] and serve the UST therewith, and, absent an objection by the UST or some other party in  
15 interest within seven (7) days thereafter, the fees and costs may be paid in full. In the event of an  
16 objection, the undisputed portion may be paid without prejudice to the balance subject to order of the  
17 Court.”

18           **PLEASE FURTHER TAKE NOTICE THAT**, consistent with the foregoing procedure,  
19 on December 12, 2021, the Court entered its *Interim Order* [the “DIP Order” [Dkr. 70]] *Granting*  
20 *Motion For Order: (I) Authorizing Debtor To Obtain Senior Secured Postpetition Financing Pursuant*  
21 *To Section 364 Of The Bankruptcy Code, (II) Granting Super-Priority Administrative Claims And*  
22 *Senior Liens, (III) Scheduling A Final Hearing, And (IV) Granting Related Relief* [the “DIP Motion”]  
23 [Dkt. 66]], which, *inter alia*, granted the DIP Motion on an interim basis and approved the terms of the  
24 DIP Loan Documents,<sup>1</sup> which provide, among other things, that:

25           Loan Proceeds shall be used solely in accordance with the Budget,  
26 including for payment of the Facility Fee, Lender's reasonable  
27 attorneys' fees and costs incurred in making and documenting the  
Loan, title insurance premiums, escrow fees, the Extension Fee,

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings ascribed to them in the DIP Motion.

1 and the Carve Out and Borrower's working capital needs and to  
2 administer the Chapter 11 Case, including insurance, repair,  
3 maintenance and construction costs with respect to the Property.  
4 With respect to the fees and costs of the Manager of the Debtor  
[i.e., SCP], Manager [i.e., SCP] shall file monthly fee statements  
5 and, absent an objection within seven (7) days thereafter, the fees  
and costs may be paid in full. In the event of an objection, the  
6 undisputed portion may be paid without prejudice to the balance  
subject to order of the Court.

7 **PLEASE FURTHER TAKE NOTICE THAT**, pursuant to the Insider Compensation  
8 Stipulation, Insider Compensation Order, DIP Motion, and DIP Order, SCP hereby files its Fee  
9 Statement for the period from April 1, 2022 through April 30, 2022. SCP reserves its right to  
10 supplement, amend, or modify the Fee Statement to include fees and/or expenses incurred during the  
11 foregoing period not covered in the attached Fee Statement or incurred subsequent to April 30, 2022.  
12

13 Annexed as **Exhibit “A”** hereto is the name of each professional who performed services  
14 for the Debtor in connection with this chapter 11 case during the period covered by this Fee Statement  
15 and the hourly rate and total fees for each professional during such period.

16 Annexed as **Exhibit “B”** hereto is the summary of hours in this Fee Statement broken up  
17 by partner and task.

18 Annexed as **Exhibit “C”** hereto are the detailed time entries for the period covered by this  
19 Fee Statement.

20 Annexed as **Exhibit “D”** hereto is the summary of expenses included in this Fee  
21 Statement.

22 Annexed as **Exhibit “E”** hereto are the detailed entries for the expenses covered by this  
23 Fee Statement.

24 **PLEASE TAKE FURTHER NOTICE that objections, if any, to this Fee Statement  
25 must be filed with the Court and served so as to be received by the undersigned counsel to the  
26 Debtor no later than seven (7) days after the filing of this Fee Statement.**

1           **PLEASE TAKE FURTHER NOTICE** that, (A) if no objection is properly and timely  
2 filed and served in accordance with the above procedures, the Debtor will pay SCP the fees and  
3 expense set forth in this Fee Statement (provided such payment is consistent with the Budget) and (B)  
4 if an objection is properly and timely filed and served in accordance with the above procedures, (1) the  
5 Debtor will pay SCP the undisputed portion of fees and expenses set forth in this Fee Statement  
6 (provided such payment is consistent with the Budget) and (2) any disputed portion of fees and  
7 expenses set forth in this Fee Statement shall be subject to review and further order by the Court.

8           Dated: May 13, 2022

CRESTLLOYD, LLC

9           */s/ Todd M. Arnold*

10          DAVID B. GOLUBCHIK

11          TODD M. ARNOLD

12          LEVENE, NEALE, BENDER, YOO

13          & GOLUBCHIK L.L.P.

14          Attorneys for Debtor and Debtor in Possession

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# **EXHIBIT "A"**

Summary of SierraConstellation Partners Professional Fees by Consultant

For the Period April 1st through April 30th

<u>Consultant</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Total</u>
Lawrence Perkins	CEO	\$790	9.70	\$7,663.00
Miles Staglik	Senior Director	\$580	3.10	\$1,798.00
Roger Gorog	Director	\$525	2.30	\$1,207.50
Colin Moran	Associate	\$235	<u>15.30</u>	\$3,595.50
			<u>30.4</u>	<u>\$14,264.00</u>

# **EXHIBIT "B"**

Summary of SierraConstellation Partners Professional Fees by Activity

For the Period April 1st through April 30th

<u>Activity / Consultant</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
<b><u>Business Operations, Cash Management &amp; CRO Support</u></b>				
Lawrence Perkins	CEO	9.70	\$790	\$7,663
Miles Staglik	Senior Director	0.70	\$580	\$406
Roger Gorog	Director	2.30	\$525	\$1,208
Colin Moran	Associate	3.70	\$235	\$870
	<i>Activity Total</i>	16.40		\$10,146

<u>Case Administration</u>				
Miles Staglik	Senior Director	2.40	\$580	\$1,392
Lawrence Perkins	CEO	0.00	\$790	\$0
Roger Gorog	Director	0.00	\$525	\$0
Colin Moran	Associate	11.10	\$235	\$2,609
	<i>Activity Total</i>	13.50		\$4,001

<u>Invoices, Fees and Retention Applications</u>				
Miles Staglik	Senior Director	0.00	\$580	\$0
Lawrence Perkins	CEO	0.00	\$790	\$0
Colin Moran	Associate	0.50	\$235	\$118
	<i>Activity Total</i>	0.50		\$118

# EXHIBIT "C"

**Summary of SierraConstellation Partners Professional Fees by Professional Service**  
For the Period April 1st through April 30th

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Business Operations, Cash Management &amp; CRO Support</b>				
<i>Lawrence Perkins</i>				
4/4/2022	Updates re: settlement discussions	0.90	\$790.00	\$711.00
4/5/2022	Review of correspondence related to lender claims; comments and correspondence w/ counsel re: same	1.00	\$790.00	\$790.00
4/7/2022	Settlement discussions	1.50	\$790.00	\$1,185.00
4/13/2022	Review of budget; comments re: budget provided to team and final review	1.00	\$790.00	\$790.00
4/14/2022	Review of pleadings and correspondence w/ counsel re: next steps	1.00	\$790.00	\$790.00
4/15/2022	Review of open workstreams and coordination with team re: execution	1.00	790	\$790.00
4/18/2022	Review of ADR letter and correspondence w/ counsel re: same	0.50	\$790.00	\$395.00
4/19/2022	Correspondence re: settlement and other open items	0.50	\$790.00	\$395.00
4/20/2022	Call w/ lenders counsel re: claims	0.80	\$790.00	\$632.00
4/29/2022	Correspondence re: various open issues	1.50	\$790.00	\$1,185.00
<u>Lawrence Perkins Total</u>				<u>\$7,663.00</u>
<i>Miles Staglik</i>				
4/6/2022	Calls with various mechanics lien holders	0.30	\$580.00	\$174.00
4/7/2022	Calls with various mechanics lien holders	0.20	\$580.00	\$116.00
4/13/2022	Work on banking access with Signature Bank	0.20	\$580.00	\$116.00
<u>Miles Staglik Total</u>				<u>\$406.00</u>
<i>Colin Moran</i>				
4/1/2022	Payments of vendors	0.10	\$235.00	\$23.50
4/4/2022	Payments of vendors	0.10	\$235.00	\$23.50
4/5/2022	Emails and Phonecalls with Escrow and LA County re property taxes	0.50	\$235.00	\$117.50
4/12/2022	Attempt to get access to development company's quickbooks	0.70	\$235.00	\$164.50
4/20/2022	Pay bills and save down & organize files	0.70	\$235.00	\$164.50
4/20/2022	Meeting with Yogi (M. Schinderman and J. Englanoff) and Crestlloyd	0.80	235	\$188.00
4/30/2022	Review of Tax Return information and emails re 2021 Tax info	0.80	\$235.00	\$188.00
<u>Colin Moran Total</u>				<u>\$869.50</u>
<i>Roger Gorog</i>				
4/28/2022	Review of documents for transition work; call with M. Staglik to discuss current status of case	1.20	\$525.00	\$630.00
4/29/2022	Work on bank account access; submit information to banks for access	1.10	\$525.00	\$577.50
<u>Roger Gorog Total</u>				<u>\$1,207.50</u>
<b>Case Administration</b>				
<i>Miles Staglik</i>				
4/5/2022	Teleconference with C. Moran on case status and work streams	0.50	\$580.00	\$290.00
4/7/2022	Teleconference with C. Moran on payments and recap of creditor call	0.10	\$580.00	\$58.00
4/13/2022	Prepare fee estimate for UST	0.30	\$580.00	\$174.00
4/13/2022	Review claims filed and mechanics liens	1.50	\$580.00	\$870.00
<u>Miles Staglik Total</u>				<u>\$1,392.00</u>
<i>Colin Moran</i>				
4/1/2022	Review emails and documents related to sale appeal and settlement	0.30	\$235.00	\$70.50
4/5/2022	Teleconference with M. Staglik on case status and work streams	0.50	\$235.00	\$117.50
4/6/2022	Notes & Analysis on Hankey interest payments	1.10	\$235.00	\$258.50
4/7/2022	Teleconference with M. Staglik on payments and recap of creditor call	0.10	\$235.00	\$23.50
4/7/2022	Teleconference with T. Arnold, creditors and their respective counsel re crestlloyd	2.80	\$235.00	\$658.00
4/7/2022	Emails re quickbooks and access to documents for creditors	0.40	\$235.00	\$94.00
4/11/2022	Compile Documents for Creditors	2.00	\$235.00	\$470.00
4/11/2022	Teleconference with M. Staglik on compiled documents	0.20	\$235.00	\$47.00

4/12/2022	Finish compiling documents for creditors	0.80	\$235.00	\$188.00
4/13/2022	Setup file package to share with creditors	0.20	\$235.00	\$47.00
4/17/2022	Begin to compile March MOR	0.50	\$235.00	\$117.50
4/18/2022	Prepare March MOR	0.90	\$235.00	\$211.50
4/19/2022	Revise and update March MOR	0.80	\$235.00	\$188.00
4/21/2022	Finalize and file March MOR	0.50	\$235.00	\$117.50
			Colin Moran Total	\$2,608.50

**Invoices, Fees and Retention Applications**

*Colin Moran*

4/8/2022	Prepare Jan MSR exhibits	0.50	\$235.00	\$117.50
			Colin Moran Total	\$117.50

# **EXHIBIT "D"**

Summary of SierraConstellation Partners Expenses by Category

For the Period April 1st through April 30th

<u>Reimbursable Expenses</u>	<u>Amount</u>
NA	\$0.00
<b>Total Expenses</b>	<b>\$0.00</b>

# EXHIBIT "E"

**Summary of SierraConstellation Partners Expenses by Detail**

For the Period April 1st through April 30th

<u>Activity</u>	<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
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NA

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 2818 La Cienega Avenue, Los Angeles, CA 90034

A true and correct copy of the foregoing document entitled **DEBTOR'S NOTICE OF MONTHLY FEE STATEMENT OF SIERRACONSTELLATION PARTNERS, LLC** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **May 13, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Kyra E Andrassy [kandrassy@swelawfirm.com](mailto:kandrassy@swelawfirm.com),  
[lgarrett@swelawfirm.com](mailto:lgarrett@swelawfirm.com); [gcruz@swelawfirm.com](mailto:gcruz@swelawfirm.com); [jchung@swelawfirm.com](mailto:jchung@swelawfirm.com)
- Todd M Arnold [tma@lnbyg.com](mailto:tma@lnbyg.com)
- Jerrold L Bregman [jbregman@bg.law](mailto:jbregman@bg.law), [ecf@bg.law](mailto:ecf@bg.law)
- Marguerite Lee DeVoll [mdevoll@watttieder.com](mailto:mdevoll@watttieder.com), [zabrams@watttieder.com](mailto:zabrams@watttieder.com)
- Danielle R Gabai [dgabai@danninggill.com](mailto:dgabai@danninggill.com), [dgabai@ecf.courtdrive.com](mailto:dgabai@ecf.courtdrive.com)
- Thomas M Geher [tmg@jmbm.com](mailto:tmg@jmbm.com),  
[bt@jmbm.com](mailto:bt@jmbm.com); [fc3@jmbm.com](mailto:fc3@jmbm.com); [tmg@ecf.inforuptcy.com](mailto:tmg@ecf.inforuptcy.com)
- David B Golubchik [dbg@lnbyg.com](mailto:dbg@lnbyg.com), [stephanie@lnbyb.com](mailto:stephanie@lnbyb.com)
- James Andrew Hinds [jhinds@hindslawgroup.com](mailto:jhinds@hindslawgroup.com); [mduran@hindslawgroup.com](mailto:mduran@hindslawgroup.com),  
[mduran@hindslawgroup.com](mailto:mduran@hindslawgroup.com)
- Robert B Kaplan [rbk@jmbm.com](mailto:rbk@jmbm.com)
- Jane G Kearl [jkearl@watttieder.com](mailto:jkearl@watttieder.com)
- Jennifer Larkin Kneeland [jkneeland@watttieder.com](mailto:jkneeland@watttieder.com), [zabrams@watttieder.com](mailto:zabrams@watttieder.com)
- Michael S Kogan [mkogan@koganlawfirm.com](mailto:mkogan@koganlawfirm.com)
- Noreen A Madoyan [Noreen.Madoyan@usdoj.gov](mailto:Noreen.Madoyan@usdoj.gov)
- Samuel A Newman [sam.newman@sidley.com](mailto:sam.newman@sidley.com), [samuel-newman-2492@ecf.pacerpro.com](mailto:samuel-newman-2492@ecf.pacerpro.com); [laefilingnotice@sidley.com](mailto:laefilingnotice@sidley.com)
- Ryan D O'Dea [rodea@shulmanbastian.com](mailto:rodea@shulmanbastian.com), [lgauthier@shulmanbastian.com](mailto:lgauthier@shulmanbastian.com)
- Sharon Oh-Kubisch [sokubisch@swelawfirm.com](mailto:sokubisch@swelawfirm.com),  
[gcruz@swelawfirm.com](mailto:gcruz@swelawfirm.com); [1garrett@swelawfirm.com](mailto:1garrett@swelawfirm.com); [jchung@swelawfirm.com](mailto:jchung@swelawfirm.com)
- Hamid R Rafatjoo [hrafatjoo@raineslaw.com](mailto:hrafatjoo@raineslaw.com), [bclark@raineslaw.com](mailto:bclark@raineslaw.com)
- Ronald N Richards [ron@ronaldrichards.com](mailto:ron@ronaldrichards.com), [7206828420@filings.docketbird.com](mailto:7206828420@filings.docketbird.com)
- Victor A Sahn [vsahn@sulmeyerlaw.com](mailto:vsahn@sulmeyerlaw.com),  
[pdillamar@sulmeyerlaw.com](mailto:pdillamar@sulmeyerlaw.com); [pdillamar@ecf.inforuptcy.com](mailto:pdillamar@ecf.inforuptcy.com); [vsahn@ecf.inforuptcy.com](mailto:vsahn@ecf.inforuptcy.com); [cblair@ecf.inforuptcy.com](mailto:cblair@ecf.inforuptcy.com)
- William Schumacher [wschumac@milbank.com](mailto:wschumac@milbank.com), [autodocketcf@milbank.com](mailto:autodocketcf@milbank.com)
- David Seror [dseror@bg.law](mailto:dseror@bg.law), [ecf@bg.law](mailto:ecf@bg.law)
- Zev Shechtman [zshechtman@DanningGill.com](mailto:zshechtman@DanningGill.com),  
[danninggill@gmail.com](mailto:danninggill@gmail.com); [zshechtman@ecf.inforuptcy.com](mailto:zshechtman@ecf.inforuptcy.com)
- Mark Shinderman [mshinderman@milbank.com](mailto:mshinderman@milbank.com),  
[dmuhrez@milbank.com](mailto:dmuhrez@milbank.com); [dlbatie@milbank.com](mailto:dlbatie@milbank.com)
- Lindsey L Smith [lls@lnbyb.com](mailto:lls@lnbyb.com), [lls@ecf.inforuptcy.com](mailto:lls@ecf.inforuptcy.com)
- United States Trustee (LA) [ustpregion16.la.ecf@usdoj.gov](mailto:ustpregion16.la.ecf@usdoj.gov)
- Genevieve G Weiner [gweiner@sidley.com](mailto:gweiner@sidley.com), [laefilingnotice@sidley.com](mailto:laefilingnotice@sidley.com); [genevieve-weiner-0813@ecf.pacerpro.com](mailto:genevieve-weiner-0813@ecf.pacerpro.com)
- Jessica Wellington [jwellington@bg.law](mailto:jwellington@bg.law), [ecf@bg.law](mailto:ecf@bg.law)

**2. SERVED BY UNITED STATES MAIL:** On May 13, 2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **May 13, 2022**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

May 13, 2022

Lourdes Cruz

/s/ Lourdes Cruz

Date

Type Name

---

*Signature*

In re Crestlloyd, LLC  
D UST Receiver RSN + Amended 20  
Largest  
File No.: 9562

Debtor  
Crestlloyd, LLC  
c/o SierraConstellation Partners LLC  
355 S. Grand Avenue Suite 1450  
Los Angeles, CA 90071

Noreen A Madoyan  
Office of the United States Trustee  
915 Wilshire Blvd., Suite 1850  
Los Angeles, CA 90017

Counsel For Receiver

Brutzkus Gubner Rozansky Seror  
Weber LLP  
David Seror/Jessica Wellington  
21650 Oxnard Street, Suite 500  
Woodland Hills, CA 91367

Biabani & Associates, Inc.  
Attn: Alex Biabani  
1600 Sawtelle Bl #104  
Los Angeles, CA 90025

Bradford Sheet Metal  
4164 Sopp Road  
Mojave, CA 93501

Branden Williams  
257 N. Cannon Dr., 2nd Fl.  
Beverly Hills, CA 90210

C.G.S. Custom Glass Specialists  
Attn: Tom Yang  
4536 Ish Drive  
Simi Valley, CA 93063

CAD Stone Works Inc.  
Attn: Cesar Hernandez  
4533 Van Nuys Bl. #201  
Sherman Oaks, CA 91403

Centurion Air, LLC  
Attn: Michael T. Pyle  
13932 Arrow Creek Road  
Draper, UT 84020

Davidson Accountancy Corp.  
William N. Davidson, CPA  
14011 Ventura Blvd., Ste. 302  
Sherman Oaks, CA 91423

Creative Art Partners  
6542 Hayes Dr.  
Los Angeles, CA 90048

Italian Luxury Design  
4 NE 39 St.  
Miami, FL 33137

Jabs Pools and Spas, LLC  
Attn: Georgina Rendon  
8055 Matilija Ave.  
Panorma City, CA 91402

Dennis Palma  
146 Beach Way  
Monterey, CA 93940

KN Coating  
201 E. Tamarack Ave  
Inglewood, CA 90301

LA DWP  
P.O. Box. 30808  
Los Angeles, CA 90030

Vesta (aka Showroom Interiors, LLC)  
Attn: Julian Buckner  
8905 Rex Road  
Pico Rivera, CA 90660

Made by TSI, Inc.  
888 Biscayne Blvd #209  
Miami, FL 33132

Midland Contractors, Inc.  
Attn: Bruce Partovi  
Po Box 8312  
Van Nuys, CA 91409

West Valley Green Landscaping, Inc.  
14761 Tupper St.  
Panorama City, CA 91402

The Vertex Companies, Inc.  
12100 Wilshire Blvd 8th floor  
Los Angeles CA 90025-0000

West Coast Gates  
339 Isis Ave.  
Inglewood, CA 90301

**Attorneys for Richard Saghian**  
Samuel A. Newman, Esq. **RSN**  
Genevieve G. Weiner, Esq.  
Sidley Austin LLP  
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Los Angeles, CA 90013

**Attorneys for Richard Saghian**  
Amy P. Lally, Esq. **RSN**  
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